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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA, Plaintiff, vs. CLINT TARRANT, Defendant.	Case No.: 2:15-cr-127-RFB **STIPULATION FOR PROTECTIVE ORDER**

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, and Kathryn C. Newman and Kimberly M. Frayn, Assistant United States Attorneys, and Defendant Clint Tarrant, and his counsel, Gia McGillivray, Esq., that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers license numbers, dates of birth, or addresses of participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

1. Protected Documents which will be used by the government in its case in chief include personal identifiers, including social security numbers, dates of birth, and addresses of participants, witnesses and victims in this case.

2. Discovery in this case will exceed 10,000 pages. Given the nature of the allegations and the facts and circumstances surrounding the crimes with which the defendants are charged, that is, the defendants assumed the identities of hundreds of persons other than themselves in order to fraudulently file tax returns and collect refunds, many of the documents in the discovery necessarily include personal identifiers. Redacting the personal identifiers of participants, witnesses, and victims would prevent the timely disclosure of discovery to the defendants.

3. The United States agrees to provide Protected Documents without redacting the personal identifiers of participants, witnesses, and victims.

4. Access to Protected Documents will be restricted to persons authorized (authorized person) by the Court, namely the defendant, attorney(s) of record and attorneys' paralegals, investigators, experts, secretaries, file clerks, law clerks, contractors, vendors, IT Department, and copy centers employed by the attorney(s) of record or performing on behalf of defendant.

5. The following restrictions will be placed on defendant, defendant's attorney(s) and the above-designated individuals unless and until further ordered by the Court. Defendants, defendants' attorneys and the above-designated individuals shall not:

a. make copies for or allow copies of any kind to be made by any other person of the Protected Documents;

b. allow any other person to read the Protected Documents; and

c. use the Protected Documents for any other purpose other than preparing to defend against the charges in the Indictment or any further superseding indictment arising out of this case.

6. Defendant's attorneys shall inform any person to whom disclosure may be made pursuant to this Order of the existence and terms of this Court's Order.

7. The requested restrictions shall not restrict the use or introduction as evidence of discovery documents containing personal identifying information such as social security numbers, drivers' license numbers, dates of birth, and addresses during the trial of this matter.

8. Upon conclusion of this action, defense counsel shall return to government counsel or destroy and certify to government counsel the destruction of all discovery documents containing personal identifying information such as social security numbers, drivers' license numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty-days after the last appeal is final.

DANIEL G. BOGDEN
United States Attorney

/s/ Kathryn C. Newman
KATHRYN NEWMAN
Assistant United States Attorney

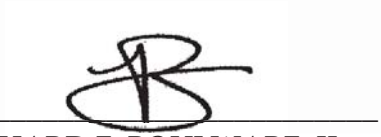
11/12/15
DATE

Gia McGillivray
GIA MCGILLIVRAY, ESQ.
Counsel for Clint Tarrant

12/11/15
DATE

ORDER

IT IS SO ORDERED this 23rd day of December, 2015.



RICHARD F. BOULWARE, II
United States District Judge